

EXHIBIT 16

Excerpts from Deposition of Leah Sampson, MSW, LCSW

(Redacted)

Page 1

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Civil Action: 9:19-cv-01322-KJD-NJK

PETER DELVECCHIA,)
et. al.)
Plaintiffs,) DEPOSITION OF:
)
v.) LEAH E. SAMPSON
)
FRONTIER AIRLINES, INC.,)
et. al.)
)
Defendants,)

Given before John P. Crawford, Jr., Court Reporter and Notary Public for South Carolina, via videoconference, on Thursday, November 10th, 2022, commencing at 10:37 o'clock a.m.

CONFIDENTIAL--SUBJECT TO PROTECTIVE ORDER

RAY SWARTZ & ASSOCIATES OF SOUTH CAROLINA
-Professional Court Reporters-

Serving the Legal Community Since 1957

(843) 593-4662

Page 2

1 A P P E A R A N C E S

2

3

4

5 For the Plaintiffs: Park Avenue Law LLC

6 By: John D. McKay, Esquire

7 201 Spear Street, Suite 1100

8 San Francisco, CA 94105

9 434-531-9569

10 JohnDMcKayAtty@gmail.com

11

12

13

14

15

16 For the Defendants: Adler Murphy & McQuillen LLP

17 By: Brian T. Maye, Esquire

18 20 South Clark Street, Suite 2500

19 Chicago, IL 60603

20 312-345-0700

21 BMaye@AMM-Law.com

22

23

24 CONFIDENTIAL--SUBJECT TO PROTECTIVE ORDER

25

Page 3

1

INDEX TO EXAMINATIONS

2

3	DIRECT EXAMINATION BY MR. MAYE	4
4	CROSS EXAMINATION BY MR. MCKAY	97
5	RE-DIRECT EXAMINATION BY MR. MAYE	107
6	RE-CROSS EXAMINATION BY MR. MCKAY	110

7

8

9

10

11

12

INDEX TO EXHIBITS

13

14 Defendant's Exhibits Pre-Marked for Identification:

15	1. Chart Notes	4
16	2. Progress Notes	4

17

18

19

20

21

22

23

24

25

CONFIDENTIAL--SUBJECT TO PROTECTIVE ORDER

1 (DOCUMENTS PRE-MARKED AS DEFENDANT 'S

2 EXHIBIT NOS. 1 AND FOR IDENTIFICATION.)

3 (Leah E. Sampson, being duly sworn,

4 testified as follows:)

5 DIRECT EXAMINATION BY MR. MAYE:

6 Q. Ms. Sampson, can you please state your full name?

7 A. Sure. It's Leah Elaine Sampson.

8 Q. What is your professional?

9 A. I am, I'm newly the chief executive officer at
10 Three Oaks Behavioral Health & Wellness, and I am
11 outpatient psychotherapist.

12 Q. Congratulations on that new position.

13 A. Thanks.

14 Q. Sure. And can you give us a brief thumbnail
15 sketch of your education?

16 A. I did my undergrad and I got, my undergrad is in
17 public relations, mass communications. I then
18 went on to Savannah State and got a master's of
19 social work, and that was in 2009. And then,
20 subsequently was license as a licensed clinical
21 social worker after, like, three years of
22 supervision and all of that.

23 Q. You're licensed by the state of North Carolina?

24 A. Yes, sir.

25 Q. And you provide a treatment to A [REDACTED] D [REDACTED],

CONFIDENTIAL--SUBJECT TO PROTECTIVE ORDER

1 A. Yes.

2 Q. Was there ever any indication that he got these
3 stereotypes at home, from his family?

4 A. No, his dad was actually the one who brought up
5 to me that he was concerned that he didn't have
6 good relationships with black people.

7 Q. Okay. And since you met with both AD and his
8 father, did you ever, ever get any indication
9 whatsoever that Peter DelVecchia had abused the
10 A [REDACTED] in any way, shape, or form?

11 A. No, I did not.

12 Q. Okay. Thank you. That's all I have.

13 RE-DIRECT EXAMINATION BY MR. MAYE:

14 Q. I just have a few follow-up questions. With
15 respect to the PTSD diagnosis, if you removed all
16 of the other traumas, [REDACTED],
17 [REDACTED], [REDACTED], [REDACTED],
18 [REDACTED], could you diagnose AD with PTSD purely
19 based on the aircraft incident?

20 A. Yes.

21 Q. And why do you say that?

22 A. Because it's traumatic to be removed in that way
23 from the way that was described to me from your
24 caregiver, on a flight with people, like, you
25 don't have any other support. And him alone being

CONFIDENTIAL--SUBJECT TO PROTECTIVE ORDER